

Message

From: Ruelas, Cynthia [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=A7E251B9DBB24D308D1FA3B219F6AA52-CRUELAS]
Sent: 9/7/2018 5:41:45 PM
To: Armann, Steve [Armann.Steve@epa.gov]
Subject: RE: Armann Comments. PCBCA2018001_PcbApprvl_2018_09_07.docx

Thanks Steve. I forwarded the email that you sent to Sara to Patrick as well so that he could provide input. I haven't been to the site, but I suspect that there are no run-off controls, and given the proximity to the water, the bio-uptake scenario, and potential impacts of PCBs to the eco-system, I think ND would be appropriate. You're right though, we should establish an appropriate action level. The Port will be collecting asphalt core samples further away from the water front, and these samples will probably be difficult to get low detection on since the asphalt will have some petroleum hydrocarbon interference, which will drive up the detection limit. I'll wait to hear back from Sara and/or Patrick on this.

Also, in terms of the ID number, Wilmington does not have a RCRA ID (at least not according to the active projects list on the shared drive). If there is no RCRA ID, then RCRAInfo V6 populates a TSCA ID. There are no entries in RCRAInfo V6 for Wilmington, since they didn't technically submit an application and they never received an approval. They basically sent an email to George with bullet point of what they wanted to do, and I am considering that correspondence as the application/work plan. I debated whether or not I should attach it to the conditional approval, and ended up just summarizing it in the upfront text of the approval. I think I'll just leave in the Region 9 PCB ID number in the subject line (even though it's also on the title of the document). Let me know if you think I should just remove it since there are so many possible IDs floating around (R9 PCB ID, RCRA ID, RCRAInfo V6 ID).

Thanks,
Cynthia

From: Armann, Steve
Sent: Friday, September 7, 2018 9:57 AM
To: Ruelas, Cynthia <RUELAS.CYNTHIA@EPA.GOV>
Subject: Armann Comments. PCBCA2018001_PcbApprvl_2018_09_07.docx

Cynthia, I have a few changes to the letter and one major issue. I cut/pasted the section on cleanup goals and asked Sara for her input. Sara is our eco person and I'd like to hear from her on this issue.